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2 District of Nevada

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7 Attorneys for Defendant
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11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 MELODY CASNER,

14 Plaintiff,

15 v.

16 NANCY BERRYHILL,
Deputy Commissioner for Operations,
performing the duties and functions not
17 reserved to the Commissioner of Social
Security,

18 Defendant.
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)
) Case No. 2:18-cv-00113-JCM-VCF
)
)

) **~~EX PARTE~~ MOTION FOR EXTENSION**
) **OF TIME**
) **(FIRST REQUEST)**

21 Defendant respectfully requests that the Court extend the time for Defendant to file her Answer
22 to the Complaint, due on April 10, 2018, by 30 days, through and including May 10, 2018.

23 An extension of time is needed in order to prepare Defendant's Answer because the
24 Commissioner is still in the process of assembling and finalizing the administrative record. This request
25 is made in good faith with no intention to unduly delay the proceedings.
26

1 This request is being made ex parte because Counsel for Defendant attempted to confer with
2 Plaintiff's counsel by e-mail on April 9, 2018 and April 10, 2018, and by telephone on April 10, 2018,
3 but was unable to reach him and wanted to file this by the original Answer due date.

4 Respectfully submitted this 10 day of April 2018.

5 DAYLE ELIESON
6 Acting United States Attorney

7 /s/ Elizabeth Firer
8 ELIZABETH FIRER
9 Special Assistant United States Attorney

10 OF COUNSEL:

11 DEBORAH LEE STACHEL
12 Regional Chief Counsel, Region IX

13 CAROL S. CLARK
14 Assistant Regional Counsel

15 IT IS SO ORDERED:

16 
17 UNITED STATES MAGISTRATE JUDGE

18 DATED: April 13, 2018

1 **CERTIFICATE OF SERVICE**

2 I, Elizabeth Firer, certify that the following individual was served with a copy of the **EX PARTE**
3 **MOTION FOR EXTENSION OF TIME** on the date and via the method of service identified below:

4 **CM/ECF:**

5 Cyrus Safa

6 Dated this 10 day of April 2018.

7 /s/ Elizabeth Firer

8 **ELIZABETH FIRER**

9 Special Assistant United States Attorney
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